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*Attorneys for Defendants  
 Irico Group Corp. and  
 Irico Display Devices Co., Ltd.*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
 ANTITRUST LITIGATION,

) Case No. 07-cv-05944-JST

) MDL No.: 1917

THIS DOCUMENT RELATES TO:  
*ALL INDIRECT PURCHASER ACTIONS*

) **DECLARATION OF ANDREW  
 LUCARELLI IN SUPPORT OF IRICO  
 DEFENDANTS' ADMINISTRATIVE  
 MOTION TO CONSIDER WHETHER  
 CHUNGHWA MATERIAL SHOULD  
 BE SEALED PURSUANT TO CIVIL  
 LOCAL RULES 7-11 AND 79-5(f)**

1 I, Andrew Lucarelli, declare as follows:

2 1. I am an attorney admitted to practice law in Washington, D.C. and am employed  
3 by the law firm of Baker Botts L.L.P., which represents Defendants Irico Group Corporation  
4 (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display”) (collectively, “Irico  
5 Defendants”). I make this Declaration based on my personal knowledge and in support of the  
6 Irico Defendants’ Administrative Motion to Consider Whether Chunghwa Material Should Be  
7 Sealed Pursuant to Civil Local Rules 7-11 and 79-5(f).

8 1. Attached hereto as Exhibit 5 is a true and correct copy of a document produced  
9 in this litigation by defendant Chunghwa Picture Tubes, Ltd. and bearing the bates label  
10 CHU00030668-0669E.

11 2. Attached hereto as Exhibit 52 is a true and correct copy of excerpts from the  
12 deposition of Jin-Song Lu, dated February 28, 2023.

13 2. Attached hereto as Exhibit 73 is a true and correct copy of a certified translation  
14 of a document produced by defendant Chunghwa Picture Tubes, Ltd. in this litigation and bearing  
15 the Bates label CHU00047273.

16 3. Attached hereto as Exhibit 75 is a true and correct copy of Defendants Irico Group  
17 Corp. and Irico Display Devices Co., Ltd.’s Notice of Motion and Motion for Summary Judgment,  
18 dated July 28, 2023.

19 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
20 28th day of July, 2023, in Rockville, Maryland.

21 /s/ Andrew L. Lucarelli

22 Andrew. L. Lucarelli (*pro hac vice*)  
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